District Judge James L. Robart 1 2 3 4 5 6 7 UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON AT SEATTLE 8 9 JULIO CURY, et al., Civil Action No.: 2:23-cv-00499-JLR 10 Plaintiffs, STIPULATION FOR AN EXTENSION 11 v. OF TIME 12 DEPARTMENT OF STATE, et al., Noted for Consideration: Defendants. March 3, 2025 13 14 As previously noted, the parties are continuing to explore whether a compromise on the 15 remaining issues in controversy can be reached. On 15 January 2025, Plaintiffs agreed to 16 17 significantly narrow the scope of the remaining issues in controversy, and Defendant Department of State ("State") began considering the matter internally. On 28 February, State's counsel 18 19 advised Plaintiffs' counsel that State anticipated being able to provide an update by 7 March. 20 Accordingly, and for the same reasons described in the previous stipulation, the parties stipulate to and propose the following schedule: 21 22 1. Plaintiffs will file their opposition and cross-motion, if any, on or before 25 23 March 2025;

24

1	2. Defendants will file their reply and opposition to any cross-motion on or before	
2	15 April 2025; and	
3	3. Plaintiffs will file their reply	in support of any cross-motion on or before 6 May
4	2025.	
5	Date: March 3, 2025	
6	Respectfully submitted,	
7	NATIONAL SECURITY COUNSELORS	TEAL L. MILLER Acting United States Attorney
8 9 10 11 12	/s/ Kelly B. McClanahan Kelly B. McClanahan, Esq., WSBA #6067 1451 Rockville Pike Suite 250 Rockville, MD 20852 501-301-4672 240-681-2189 fax Kel@NationalSecurityLaw.org	Assistant United States Attorney United States Attorney's Office Western District of Washington 700 Stewart Street, Suite 5220 Seattle, Washington 98101-1271 Phone: 206-553-7970
13	Counsel for Plaintiffs	Fax: 206-553-4073 Email: <u>Katie.fairchild@usdoj.gov</u>
14 15	I certify that this memorandum contains 31 words, in compliance with the Local Civil Rules.	5 Counsel for Defendants
16	Ruics.	
17		
18		
19		
20		
21		
22		
23		
24		

1	[PROPOSED] ORDER
2	It is so ORDERED. The Clerk is DIRECTED to update the noting date for Defendants' motion for summary judgment (Dkt. # 21) to May 6, 2025.
3	101 Summary Judgment (DRt. # 21) to May 6, 2025.
4	Dated this 4th day of March, 2025.
5	Dated this 4th day of Match, 2023.
6	O P ROX
7	JAMES L. ROBART United States District Judge
8	Officed States District Judge
9	
10	
11	
12	
13	
14	
15	
16	
17	
18	
19	
20	
21	
22	
23	
24	